

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION**

In re DMCA Section 512(h) Subpoena to Discord,  
Inc.

**Case No. 3:23-MC-00062-S**

**JOINT MOTION FOR ENTRY OF PROTECTIVE ORDER**

Pursuant to Fed. R. Civ. P. 26(c), Nexon Korea Corporation (“Nexon”) and Discord, Inc. (“Discord”) respectfully file this Joint Motion for Entry of Protective Order and attach a proposed Protective Order hereto as Exhibit A.

On or about October 3, 2023, pursuant to 17 U.S.C. §512(h), Nexon served a subpoena upon Discord requesting that Discord provide information sufficient for Nexon to identify users who may have violated Nexon’s intellectual property rights (the “Subpoena”). Discord timely objected to the subpoena on a number of grounds, and when the parties’ multiple efforts to resolve the dispute were not successful, Nexon filed a motion to compel. Nexon and Discord have been diligently meeting and conferring in an attempt to resolve their dispute to eliminate the need for further court action.

Accordingly, through the meet and confer process, Nexon and Discord have agreed that responsive documents and information will contain confidential, proprietary, and business information and/or trade secrets, including and without limitation, protected personal information of Discord users. Thus, in the interest of privacy, and in order to ensure proper restricted use of the disclosed information, Discord and Nexon seek protection of the disclosed documents and

information. Accordingly, NEXON and DISCORD, without waiving any claims or defenses that either party may have on the merits of the Subpoena or motion to compel, stipulate to the entry of the attached Protective Order, and respectfully request that the Court enter the proposed Protective Order to facilitate satisfaction of the Subpoena.

Respectfully submitted,

/s/ Jennifer H. Doan

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**CERTIFICATE OF SERVICE**

The undersigned certifies that all counsel of record are being served with a copy of this document via the Court's CM/ECF system on this the 28th day of February 2024.

/s/ Jennifer H. Doan

Jennifer H. Doan

**CERTIFICATE OF CONFERENCE**

Pursuant to Local Rule 7.1(a), the parties met and conferred regarding the requested relief. This motion is filed jointly and is unopposed.

/s/ Jennifer H. Doan

Jennifer H. Doan